IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA CHARLOTTESVILLE DIVISION

)
WILD VIRGINIA, VIRGINIA) Case No. 3:20-cv-00045-NKM
WILDERNESS COMMITTEE,)
UPSTATE FOREVER, SOUTH)
CAROLINA WILDLIFE FEDERATION,)
NORTH CAROLINA WILDLIFE)
FEDERATION, NATIONAL TRUST)
FOR HISTORIC PRESERVATION,)
MOUNTAINTRUE, HAW RIVER)
ASSEMBLY, HIGHLANDERS FOR)
RESPONSIBLE DEVELOPMENT,)
DEFENDERS OF WILDLIFE,)
COWPASTURE RIVER)
PRESERVATION ASSOCIATION,)
CONGAREE RIVERKEEPER, THE)
CLINCH COALITION, CLEAN AIR)
CAROLINA, CAPE FEAR RIVER	
WATCH, ALLIANCE FOR THE	
SHENANDOAH VALLEY, and)
ALABAMA RIVERS ALLIANCE,)
)
Plaintiffs,)
)
v.)
)
COUNCIL ON ENVIRONMENTAL)
QUALITY and MARY NEUMAYR IN)
HER OFFICIAL CAPACITY AS CHAIR)
OF THE COUNCIL ON)
ENVIRONMENTAL QUALITY,)
•)
Defendants.)

DEFENDANTS' MOTION FOR EXTENSION OF TIME

For the reasons set forth in Defendants' Opposition to Plaintiffs' Request for Expedited Briefing and Motion for Extension of Time (ECF No. 31), Defendants move the Court to extend the deadline for their response to Plaintiffs' Motion for a Preliminary Injunction (ECF No. 30), and set the schedule below for the briefing of Plaintiffs' Motion for a Preliminary Injunction and

Defendants' forthcoming Motion to Dismiss:

August 18, 2020 Plaintiffs' Motion for Preliminary Injunction

August 25, 2020 Defendants' Motion to Dismiss

September 8, 2020 Plaintiffs' Opposition to Motion to Dismiss, Defendants'

Opposition to Motion For Preliminary Injunction

September 15, 2020 Plaintiffs' Reply Supporting Preliminary Injunction, Defendants

Reply Supporting Motion to Dismiss

Dated: August 19, 2020

Respectfully submitted,

THOMAS T. CULLEN United States Attorney

/s/ Krista Consiglio Frith

Assistant United States Attorney Virginia Bar No. 89088 United States Attorney's Office P.O. Box 1709 Roanoke, VA 24008 TEL (540) 857-2250 FAX (540) 857-2614 Krista.frith@usdoj.gov JEFFREY BOSSERT CLARK
Assistant Attorney General
JONATHAN BRIGHTBILL
Principal Deputy Assistant Attorney General
PAUL SALAMANCA
Senior Counsel

/s/Barclay T. Samford
BARCLAY T. SAMFORD
NM State Bar No. 12323
Senior Attorney
U.S. Department of Justice
Environment and Natural Resources
Division
Natural Resources Section
999 18th Street, South Terrace, Suite 370
Denver, CO 80202
Tel: (303) 844-1475

E-mail: clay.samford@usdoj.gov

MATTHEW R. OAKES Senior Counsel Environment and Natural Resources Division, Law and Policy Section U.S. Department of Justice

Post Office Box 7415 Washington, D.C. 20044

Tel: (202) 514-2686

E-mail: matthew.oakes@usdoj.gov

CLARE BORONOW

Trial Attorney
U.S. Department of Justice
Environment and Natural Resources
Division
Natural Resources Section
999 18th Street, South Terrace, Suite 370
Denver, CO 80202

Tel: (303) 844-1362 clare.boronow@usdoj.gov